



McKinney-Vento Toolkit

A Guide for Homeless Liaisons,
LEAs, and Schools

Tennessee Department of Education | April 2021



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Introduction

The Education for Homeless Children and Youth program, authorized under Title VII, Part B of the [McKinney-Vento Act](#), was reauthorized in December 2015 with the passage of the Every Student Succeeds Act (ESSA). All local educational agencies (LEAs) are required to provide needed services to homeless children, as well as set aside a portion of their Title I, Part A funding for students experiencing homelessness. In addition, the Tennessee Department of Education (department) receives funding through the federal McKinney-Vento Homeless Education Grant Program and distributes grants competitively to LEAs that have developed programs that document effective collaboration between LEAs and service providers to ensure that homeless students receive needed services. All LEAs, regardless of whether they receive a McKinney-Vento subgrant, must comply with required identification, reporting, and service responsibilities to homeless children and youth (such as enrollment, transportation, free lunch, equal access to education and extracurricular activities, services, etc.).

The McKinney-Vento Act places a strong emphasis on the importance of school stability for students experiencing homelessness and is designed to address the challenges that these students face in enrolling, attending, and succeeding in school. Research shows that changing schools multiple times may significantly impede a student's academic and social growth. Therefore, the McKinney-Vento Act calls for LEAs to maintain students in their school of origin to promote school stability and greater educational outcomes, unless it is determined not to in the student's best interest.

This toolkit provides clear and specific explanations of the provisions of the McKinney-Vento Act and includes helpful practices, procedures, and tools. New homeless liaisons, as well as experienced liaisons, can use the toolkit to understand the law and find ways to improve their programs. Every LEA, school, student, and family is different. Local liaisons are encouraged to use this guide and adapt the resources in this toolkit to meet the unique needs of their community.

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Who are Homeless Children and Youth?

The Definition of Homeless

The McKinney-Vento definition of the term “homeless children and youths”—

- (A) means individuals who lack a fixed, regular, and adequate nighttime residence...; and
- (B) includes—
 - (i) children and youths who are sharing the housing of other persons due to loss of housing, economic hardship, or a similar reason; are living in motels, hotels, trailer parks, or camping grounds due to the lack of alternative adequate accommodations; are living in emergency or transitional shelters; or are abandoned in hospitals;
 - (ii) children and youths who have a primary nighttime residence that is a public or private place not designed for or ordinarily used as a regular sleeping accommodation for human being;
 - (iii) children and youths who are living in cars, parks, public spaces, abandoned buildings, substandard housing, bus or train stations, or similar settings; and
 - (iv) migratory children who qualify as homeless for the purposes of this subtitle because the children are living in circumstances described in clauses (i) through (iii). [42 U.S.C. § 11434a(2)]

Eligibility for McKinney-Vento services is dependent on the criteria of "fixed, adequate, and regular" being met. If the primary nighttime residence does not meet all criteria of being "fixed, adequate, and regular," then eligibility for services can be denied. However, the determination should always be made on a case-by-case basis.

Homeless children and youth must have equal access to the same free, appropriate public education (FAPE), including public preschool education, as provided to other children and youth. LEAs must review the requirements in laws, regulations, practices, or policies that may act as a barrier to the identification, enrollment, attendance, or success in school of homeless children and youth.

Local Liaison Roles & Responsibilities

The Duties of the Local Liaison

The McKinney-Vento Act includes a "job description" for the local liaison in the form of a list of duties.

According to the Act [42 U.S.C. § 11432(g)(6)(A)], local liaisons must ensure that:

- (i) children and youth experiencing homelessness are **identified** by school personnel through outreach and coordination activities with other entities and agencies;
- (ii) children and youth experiencing homelessness are **immediately enrolled** in, and have a full and equal opportunity to succeed in, schools within the district;
- (iii) children, youth, and families experiencing homelessness have access to and **receive educational services** for which they are eligible, including Early Head Start and Head Start programs, early intervention services under Part C of the Individual with Disabilities Education Act, and other preschool programs administered by the Local Education Agency (LEA);
- (iv) children, youth, and families experiencing homelessness receive **referrals** to health care, dental, mental health, substance abuse, housing, and other appropriate services;
- (v) the parents or guardians of students experiencing homelessness are **informed** of the educational and related opportunities available to their children, and are provided with meaningful **opportunities to participate** in the education of their children;
- (vi) **public notice** of the educational rights of students experiencing homelessness is disseminated in locations frequented by families, and youth experiencing homelessness, including schools, shelters, public libraries, and soup kitchens, in a manner and form understandable to parents, guardians, and unaccompanied youth;
- (vii) enrollment **disputes** are mediated in accordance with the provisions of the Act;
- (viii) parents, guardians, and unaccompanied youth experiencing homelessness are **fully informed of all transportation services available** to McKinney-Vento students, including transportation to the school of origin, and are assisted in accessing transportation;
- (ix) school personnel providing services to students experiencing homelessness receive **professional development** and other support; and
- (x) unaccompanied youth:
 - (xi) are enrolled in school;
 - (xii) have opportunities to meet the same challenging State academic standards as other children and youth; and
 - (xiii) are informed of their status as independent students under the Higher Education Act of 1965 (20 U.S.C. § 1087v) and receive assistance verifying this status for purposes of the Free Application for Federal Student Aid (FAFSA).

McKinney-Vento Homeless Program Timeline of Reminders

July

- At the start of the new school year, begin identifying students who are eligible for McKinney-Vento services. Utilize the previous school year's year-end status and checkpoints, as well as enrollment form/residency forms for identification. Utilize McKinney-Vento rights and notification forms as students are identified.
- Update homeless poster placements. Be sure poster locations are documented in writing for easy identification if asked where posters are located.
- Evaluate and update any LEA paperwork, forms, and written policies utilized for the homeless program, making sure contact information, school year and dates, and policies are correct and meet all requirements (see *Mandated Policy & Procedures* section).
- Check the LEA's Student Information System (SIS) to ensure that the LEA begins the school year with **zero** (0) students identified as McKinney-Vento eligible.

August/September

- New McKinney-Vento liaisons must submit an [ePlan User Access Form](#) if they will require access to ePlan.
- New McKinney-Vento liaisons must update ePlan with the correct contact information.
- New McKinney-Vento liaisons are strongly encouraged to participate in the online McKinney-Vento Self-Paced Training provided by the [National Center for Homeless Education \(NCHE\)](#).
- Provide training to LEA- and school-level staff (certified and non-certified) and community partners so they are aware of homeless identification, eligibility, and enrollment procedures.
- Enter eligible students in your SIS and keep your system current throughout the year.
- Seek supports from community partners for students (begin to plan for holidays as well).
- Check the accuracy of McKinney-Vento students' identification and alignment with SIS and Education Information System (EIS) uploads.

October/November

- Ensure McKinney-Vento eligible students are in your SIS and align with EIS uploads for certification.
- National Association for the Education of Homeless Children and Youth (NAEHCY) Conference held.
- Check the accuracy of McKinney-Vento students' identification and alignment with SIS and EIS uploads.

December

- Facilitate and organize supports from the community for children/youth during the holidays (food drives/clothing drives, etc.).
- Check the accuracy of McKinney-Vento students' identification and alignment with SIS and EIS uploads.

January

- Review McKinney-Vento services and procedures with staff during the startup of the new semester.
- Check the accuracy of McKinney-Vento students' identification and alignment with SIS and EIS uploads.

February

- Check the accuracy of McKinney-Vento students' identification and alignment with SIS and EIS uploads.

March/ April

- Homeless Immunization Report instrument opens in ePlan.
- Check the accuracy of McKinney-Vento students' identification and alignment with SIS and EIS uploads.

May/ June

- Verify students' living situations at year-end for prioritization at the beginning of the school year.
- Send an end-of-year letter to McKinney-Vento families. An end-of-year letter sample template can be found [here](#).
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- Assess what worked well with the homeless program and determine if any changes need to be made. Be sure to review data to determine student outcomes and include relevant stakeholders in the assessment process.
- Immunization report due in ePlan.
- Check the accuracy of McKinney-Vento students' identification and alignment with SIS and EIS uploads.

Mandated Policy and Procedures

The McKinney-Vento Act is designed to assist students experiencing homelessness overcome barriers towards enrolling, attending, and being successful in school. State education agencies (SEAs) and LEAs are required to review and revise laws, regulations, practices, or policies that act as barriers to ensure homeless students have the same opportunity to obtain free, appropriate public education as those children and youth that are not experiencing

homelessness [ESSA §721, 722(g)(1)(I), 722(g)(7)]. **LEAs should have written policies and procedures focusing on identification, best interest, enrollment, and transportation, as well as a dispute resolution procedure.**

To remain in compliance with the McKinney-Vento Act, there are key elements that each policy and procedure should contain. This section may be used as a guide to ensure an LEA's local policy has those necessary elements.

The McKinney-Vento Act requires each LEA to have specific policies and procedures in place to ensure homeless students have equal access to free and appropriate public education.

Identification of Homeless Children and Youth

Every LEA must appoint a local homeless education liaison (hereafter referred to as local liaison) to fulfill the duties of the position established by law [42 U.S.C. § 11432(g)(1)(J)(ii)]. One of these duties is to ensure that children and youth in homeless situations are identified by school personnel and through coordination activities with other entities and agencies [42 U.S.C. § 11432(g)(6)(A)(i)]. Once students are identified, the local liaison must ensure that they receive the services and supports they need to enroll in and have a full and equal opportunity to succeed in, school [42 U.S.C. § 11432(g)(6)(A)(ii)].

A housing questionnaire or nighttime residency form is highly recommended and commonly used to meet requirements around identification. Sample templates can be found below:

- [McKinney-Vento Housing Form](#)
- [McKinney-Vento Housing and Educational Rights](#)

Conversations about a family's housing situation can sometimes be tense, uncomfortable, and/or invasive. This [tip sheet](#) provides trauma-sensitive strategies and conversation starters for some of the most common conversations you will encounter with students, families, and LEA administration.

LEAs must ensure that public notice of the educational rights of homeless children and youth is disseminated in schools, family shelters, soup kitchens, and other places where these children and youth

may receive services [42 U.S.C. § 11432(g)(6)(A)(v)]. To help fulfill this requirement, LEAs may order free homeless informational posters at the [National Center for Homeless Education \(NCHE\) website](#).

Identifying children and youth experiencing homelessness can be challenging for many reasons, and unfortunately, homelessness often goes unnoticed by school personnel. Identification challenges may include:

- Students and families may try to hide their homelessness because they are embarrassed or fear they will be judged or stigmatized.
- The fear of losing custody of their children often prevents homeless parents from revealing their living circumstances to school officials.
- Unaccompanied homeless youth may not report their homeless status for fear of being returned to unsafe family environments or taken into the custody of the child welfare system.
- Schools and service providers may be unaware of children and youth who are not enrolled in school and are living in places other than shelters, such as doubled up with another family or in a hotel or motel, due to homelessness.
- Homeless families and unaccompanied homeless youth may not realize that their circumstances fit the McKinney-Vento definition of homeless.
- School personnel may not understand the nature of homelessness or the McKinney-Vento definition of homeless and may not recognize signs that a student has lost housing

To help address these challenges, LEA and school staff should be trained annually on the common signs of homelessness. A list of the most [common signs of homelessness](#) can be found on the [National Center for Homeless Education \(NCHE\) website](#).

The Family Educational Rights and Privacy Act (FERPA)

The Family Educational Rights and Privacy Act (FERPA) is a federal law that affords parents the right to have access to their children's education records, the right to seek to have the records amended, and the right to have some control over the disclosure of personally identifiable information from the education records. When a student turns 18 years old or enters a post-secondary institution at any age, the rights under FERPA transfer from the parents to the student ("eligible student"). The FERPA statute is found at [20 U.S.C. § 1232(g)] and the FERPA regulations are found at 34 CFR Part 99. FERPA protects education records, including academic report cards, transcripts, class schedules, disciplinary records, and contact/family information. To find more information from the U.S. Department of Education on FERPA you can visit the [Family Educational Rights and Privacy Act \(FERPA\)](#). Tips for sharing and respecting the privacy of students experiencing homelessness can be found [here](#).

Eligibility

To determine a student's McKinney-Vento eligibility, LEAs must determine whether a student's living arrangement meets the McKinney-Vento definition of homeless. In this process, LEAs may encounter instances where they feel the need to confirm the information provided about a child's or youth's living arrangements. Click on the links below to see sample questionnaire templates.

- [McKinney-Vento Housing Questionnaire](#)

Once a student has been identified and is eligible to receive McKinney-Vento services, the parent/guardian or unaccompanied youth should be informed of their rights under the McKinney-Vento Act. A sample [Housing and Education Rights Template](#) can be found here.

It is recommended that LEAs consider following the practices mentioned above to ensure that efforts to confirm information about a child's or youth's living arrangements are reasonable, effective, discreet, and in compliance with privacy guidelines.

Policies and Procedures

As noted previously, use a housing questionnaire that incorporates informative yet non-invasive questions about a student's living arrangement as part of your LEA's enrollment paperwork. Use the information gathered on this questionnaire to assist with making determinations of McKinney-Vento eligibility. Avoid using the word "homeless," as it may be off-putting; instead, incorporate questions that describe living arrangements included in the McKinney-Vento definition of homeless.

As required by the McKinney-Vento Act, enroll students seeking McKinney-Vento eligibility immediately, even if they are unable to provide paperwork normally required for enrollment [42 U.S.C. § 11432(g)(3)(C)(i)(I)]. Efforts to confirm eligibility should take place once full enrollment has occurred.

If, after investigating, an LEA concludes that the student is not McKinney-Vento eligible, the LEA must provide the parent, guardian, or unaccompanied youth the opportunity to appeal the decision.

Best Interest Determination

The concept of best interest appears in the McKinney-Vento Homeless Assistance Act in relation to a student's school selection options, which include the school of origin and the local attendance area school. The best interest determination should always be based on student-centered factors [ESSA § 722(g)(3)(B)]. Student-centered factors include the impact of mobility on achievement, education, health, and safety of homeless children and youth [ESSA § 722(g)(3)(B)(ii)]. Priority should be given to the request of the child's or youth's parent or guardian or the unaccompanied youth [ESSA § 722(g)(3)(B)(ii)]. If the LEA homeless liaison decides it is not in the best interest of the student to remain in the school of origin, a written explanation of the determination must be provided to the parent, guardian, or unaccompanied youth [ESSA §

722(g)(3)(B)(iii)]. The explanation must be written in a manner that the parent, guardian, or unaccompanied youth can understand and in a timely manner. While the school of best interest is being determined, the child must be enrolled in the school of the parent's choice until a final decision is made.

The LEAs homeless liaison and other school personnel play a critical role in helping parents, guardians, and unaccompanied youth experiencing homelessness evaluate the best interest. Involving parents and guardians fully in the school selection process can reduce the likelihood of disputes or unnecessary school changes and respect the role of parents and guardians in their child's education. A sample Best Interest Checklist can be found [here](#).

Enrollment

The enrollment policy must allow children and youth to immediately enroll in school even if they are not able to produce documents that are typically required for school enrollment [ESSA § 722(g)(3)(C)(i)]. For this purpose, documents are defined as:

- previous academic records,
- records of immunization and other required health records,
- proof of residency,
- proof of guardianship,
- birth certificates, or
- any other documentation necessary for enrollment.

The policy should also include how the LEA will assist the child or youth with obtaining records such as immunizations or other required health records [ESSA § 722(g)(3)(C)(iii)]. Record maintenance and timely transfer of records are essential elements to the school enrollment policy.

Transportation

Transportation policies must provide students experiencing homelessness with transportation comparable to those students that are not experiencing homelessness [ESSA § 722(g)(4)(A)]. The policy must ensure that transportation is provided at the request of the parent or guardian (or, in case of an unaccompanied youth, the local liaisons) to or from the school of origin, even during enrollment disputes [ESSA § 722(g)(3)(E)(i)]. It is vital to provide the transportation options that are available within the LEA's transportation policy to the parent/guardian or unaccompanied youth once eligibility is determined. A system of providing gas vouchers, cards, or reimbursements may be utilized and funded through Title I, Part A homeless set-aside funds or the McKinney-Vento subgrant. When developing a transportation plan with families, it is important to keep a hard copy of the transportation plan on file. This plan should be reviewed and revised if barriers occur. Sample templates focused on transportation can be found below:

- [McKinney-Vento Transportation Options Template](#)

- [McKinney-Vento Transportation MOU Template](#)

Dispute Resolution Procedures

Each LEA should have its own written dispute resolution policy that provides the procedures for resolution at the local level. The policy at the local level must be consistent with the state-level policy, which can be found in [ePlan.tn.gov > TDOE Resources](#) > ESSA Guidance, PPTs, & Webinars > Title IX, Part A Education for Homeless Children & Youth > Resources for Homeless Liaisons > [McKinney-Vento State-Level Dispute Resolution](#).

When a dispute arises over eligibility, school selection, or enrollment in a school, a written explanation must be provided, and those involved must be educated about their right to dispute.

Tips for Establishing an Effective Dispute Resolution Process

In establishing a strong, effective dispute resolution process, LEAs should include the following items in information distributed to parents, guardians, or unaccompanied youth when discussing decisions regarding enrollment:

- Notice of the right to file a complaint, raise a compliance issue, or file an appeal;
- A step-by-step description of how to appeal the school's decision that includes a simple form parents, guardians, or unaccompanied youth can complete and submit to the school to initiate the dispute process. Copies should be provided to the parent, guardian, or youth for their records;
- Notice that, if the parent, guardian, or unaccompanied youth is an English learner, use a native language other than English, or need additional supports because of a disability, translators, interpreters, or other support services will be made available in the appropriate language without charge;
- Notice of the right to be enrolled immediately in the school in which enrollment is sought pending final resolution of the dispute;
- Notice that immediate enrollment includes receiving adequate and appropriate transportation to and from the school of origin and the ability to fully participate in all school activities;
- List of legal and advocacy service providers in the area that can provide additional assistance during any part of the process;
- Contact information for the local liaison and state coordinator, with a brief description of their roles; and
- Timelines for resolving LEA- and state-level appeals.

These processes may also include any administrative procedures adopted by the LEA for addressing matters such as a parent or student complaints, attendance, credit recovery, or grade placement. In some

circumstances, additional concerns may be appropriately addressed in an Individualized Education Program (IEP) team meeting or a §504 placement team meeting. Other appropriate processes may include investigation of matters related to bullying, sexual harassment, or illegal discrimination. A sample LEA-level dispute resolution process can be found [here](#).

School Counselor Roles and Supports

Unaccompanied Youth Experiencing Homelessness

The partnership between the local liaison and the school counselor is a critical element of promoting awareness of McKinney-Vento requirements and the educational rights of students experiencing homelessness (Strawser, Markos, Yamaguchi, & Higgins, 2000). By working together to ensure that all key stakeholders, including parents, students, teachers, and administrators know the McKinney-Vento definition of homelessness and the supports available to McKinney-Vento eligible students, students, and their families can receive needed supports as early as possible.

The McKinney-Vento Act defines unaccompanied youth as “a homeless child or youth not in the physical custody of a parent or guardian” [42 USC § 11434a(6)]. Taking a closer look at the definition, two conditions must be present for a child or youth to be considered an unaccompanied youth under the McKinney-Vento Act:

1. The child’s or youth’s living arrangement meets the Act’s definition of homeless, and
2. The child or youth is not in the physical custody of a parent or guardian physical custody refers to where a child or youth is physically living; as such, a child or youth who is not in the physical custody of a parent or guardian is a child or youth who is not living with a parent or guardian. It is important to note, however, that the presence of a custody or guardianship issue alone would not make a student eligible for McKinney-Vento services; rather, the student’s living arrangement also must be considered homeless.

McKinney-Vento eligible students, including unaccompanied youth, are entitled to enroll in school immediately, even if lacking documents normally required for enrollment or having missed application or enrollment deadlines during any period of homelessness [42 U.S.C. § 11432(g)(3)(c)(i)].

An [unaccompanied youth flow chart](#) can be found on the NCHE website and a sample Caregiver Authorization Form can be found [here](#). This form is intended to address the McKinney-Vento Homeless Assistance Act requirement that homeless children have access to education and other services for which they are eligible. The McKinney-Vento Homeless Assistance Act states specifically that barriers to enrollment must be removed. While the McKinney-Vento Act does not specify a method that must be used to enroll unaccompanied youth, many LEAs have developed self-enrollment forms, caregiver affidavits, or other forms to replace typical proof of guardianship.

Post-Secondary Education

The McKinney-Vento Act requires school counselors to support students experiencing homelessness in the area of college and career readiness [ESSA § 722(g)(1)(K)]. Unfortunately, despite the important role that school counselors play in college and career counseling, their work may be hindered by large caseloads and

insufficient college-counseling information, particularly in lower-resourced schools (Perna et al., 2008). In schools with lower ratios of students to counselors, attendance rates were higher, and discipline rates were lower Carey and Harrington (2010a, 2010b). This suggests that in schools where students may benefit the most from school counselors, such as high poverty schools with increased numbers of students experiencing homelessness, services are not as readily available as they are in schools where there are more resources. Therefore, it is important for LEAs to further explore the role of the school counselor and how they can support the college and career preparation of students experiencing homelessness.

The best solution to ending the cycle of homelessness is for students to pursue post-secondary education. At the beginning of every year, with the help of the school counselor (or perhaps a teacher “coach” who works with unaccompanied youth), begin to prepare students for college and career readiness. LEAs should ensure that school counselors obtain additional training in working with students experiencing homelessness so they may provide the more extensive support needed to ensure that this population of students are college and career ready. NCHE has a wealth of information and resources on their [Access to Higher Education for Students Experiencing Homelessness](#) webpage and additional templates focused on the FAFSA process can be found below:

- [FAFSA Round-Up Week Tips for School Counselors](#)
- [Sample Letter of FAFSA Round-Up Week Student Template](#)

Students who wish to receive federal aid to pay for post-secondary education must submit a FAFSA each year they are enrolled in a post-secondary education institution. However, many students experiencing homeless may have difficulties navigating through the FAFSA process. This would be the perfect opportunity to host a McKinney-Vento FAFSA Week. The National Association for the Education of Homeless Children and Youth (NAEHCY) has created a [FAFSA toolkit](#) that contains helpful resources and tools for local liaisons, including ideas for holding FAFSA focused events. Additionally, many states and institutions use the information collected through the FAFSA to determine eligibility for state, institutional, and other aid, so students should complete their FAFSA as soon as possible to ensure maximum aid eligibility.

Unaccompanied homeless youth are eligible to apply for the FAFSA as an independent. The McKinney-Vento Act requires local liaisons or counselors to inform unaccompanied homeless youth of their status as independent students and help them obtain verification of that status. To support the implementation of this policy, a sample letter to help determine the independent student status of unaccompanied homeless youth for the FAFSA can be [here](#). The unaccompanied homeless youth must submit an affidavit every year for verification if they are enrolled in post-secondary school.

Funding Sources

Overview

The LEA's homeless education program can be funded through two funding sources: the ESSA Title I, Part A homeless district set-aside and the McKinney-Vento subgrant. To identify and address the needs of students experiencing homelessness more effectively, both the McKinney-Vento Act and Title I, Part A require cross-program coordination.

Local liaisons must coordinate and collaborate with other school personnel responsible for providing services to students experiencing homelessness [42 U.S.C. § 11432(g)(6)(C)]. Title I, Part A requires that programs operated under its authority coordinate at the state and local levels. All LEAs receiving Title I, Part A funds must include in their local plans a description of how the LEAs Title I, Part A program is coordinated with its McKinney-Vento program [20 U.S.C. § 6312(a)(1)(B)]. The development of the local plan should include timely and meaningful consultation with the local liaison [20 U.S.C. § 6312(a)(1)(A)] and must describe the Title I, Part A services that will be provided to students experiencing homelessness, including through the homeless set-aside [20 U.S.C. § 6312(b)(6)]. In addition to meeting each program's statutory requirements, cross-program coordination provides an opportunity to optimize resource allocation. In order to meet the needs of all students, including students experiencing homelessness, it is critical that both programs work together to leverage resources to the greatest extent possible.

It is also important to note that children and youth experiencing homelessness are automatically eligible for Title I, Part A services, whether or not they attend a Title I, Part A school or meet the academic standards required of other students for eligibility [20 U.S.C. § 6315(c)(2)(E)]; ED, 2017, p. 39).

Title I, Part A Homeless District Set-Aside Funds

Each LEA that receives a Title I, Part A allocation, must reserve a sufficient portion of funds to provide services to students experiencing homelessness that are comparable to those provided to students in Title I schools. Homeless set-aside funds may be used to provide comparable services to students experiencing homelessness who do not attend a Title I school, but also may be used to provide services to students experiencing homelessness, including those attending Title I schools, that are not ordinarily provided to other Title I students, including funding the local liaison position, and funding transportation to and from the school of origin [ED, 2017, p. 40; 20 U.S.C. § 6313(c)(3)(C)(ii)].

Title I, Part A homeless district set-aside funds are governed by two principles:

1. The services provided with these funds must be reasonable and necessary to assist students experiencing homelessness to take advantage of educational opportunities (ED, 2017, p41).
2. The funds must be used only as a last resort when funds or services are not available from other public or private sources (ED, 2017, p41).

While the homeless set aside is required for Title I, there is no mandated amount or percentage in the statute. Determining the homeless set-aside amount requires collaboration between the LEA's Title I, Part A and McKinney-Vento programs. The set-aside should be determined based on an assessment of the needs of students experiencing homelessness within the LEA, considering both the number and needs of these students [20 U.S.C. § 6313(c)(3)(C)(i)]. There are various methods that can be used to calculate the set-aside amount.

Once an LEA has identified the needs of students experiencing homelessness to be addressed, the amount of funding necessary to provide services should be determined. Methods to calculate the set-aside amount may include:

- Multiply the number of students experiencing homelessness by the Title I, Part A per-pupil allocation.
- Match the amount of McKinney-Vento subgrant dollars received by the LEA, if applicable.
- Adjust previous set-aside amounts based on past set-aside expenditures and trend data (academic outcome and educational needs, changes in poverty levels and/or economy in the community, number of students experiencing homelessness).
- Reserve the set-aside amount based on free or reduced-price lunch count.

Title I, Part A Homeless District Set-Aside Allowable Use of Funds

Title I, Part A homeless district set-aside funds may be used for, but are not limited to, the following:

- items of clothing necessary to meet a school's dress or uniform requirement;
- clothing and shoes necessary to participate in physical education classes;
- student fees that are necessary to participate in the general education program;
- personal school supplies;
- birth certificates necessary to enroll in school;
- immunizations;
- food;
- personal hygiene products;
- medical and dental services;
- eyeglasses and hearing aids;
- counseling services to address issues related to homelessness that is impeding learning;
- outreach services to students living in shelters, motels, and other temporary residences;
- extended learning time (i.e., before and after school, Saturday classes, summer school) to compensate for lack of quiet time for homework in shelters or other overcrowded living conditions;
- tutoring services, especially in shelters or other locations where homeless students live;
- family engagement specifically oriented to reaching out to families of homeless students;
- fees for Advanced Placement (AP) and International Baccalaureate (IB) testing;
- Cap and gown for graduation;
- fees for college entrance exams such as the SAT or ACT; and

- GED testing for school-age students (ED, 2017, pp. 40-41).

McKinney-Vento Allowable Activities

Allowable activities under the McKinney-Vento Act, including those funded with the Title I, Part A Homeless District Set-Aside, may consist of, but are not limited to, the following [ESSA § 722(g)(6), 723(d)]:

1. The provision of tutoring, supplemental instruction, and enriched educational services that are linked to the achievement of the same challenging State academic standards as the State establishes for other children and youth [ESSA § 723(d)(1)].
2. The provision of expedited evaluations of the strengths and needs of homeless children and youth [ESSA § 723(d)(2)], including needs and eligibility for programs and services (such as educational programs for gifted and talented students, children with disabilities, and English learners, services provided under Title I of the ESSA [20 U.S.C. 6301 et seq.] or similar State or local programs, programs in career and technical education, and school nutrition programs).
3. Professional development and other activities for educators and specialized instructional support personnel that are designed to heighten the understanding and sensitivity of such personnel to the needs of homeless children and youth, the rights of such children and youth under this part, and the specific educational needs of runaway and homeless youth [ESSA § 723(d)(3)].
4. The provision of referral services to homeless children and youth for medical, dental, mental, and other health services [ESSA § 723(d)(4)].
5. The provision of assistance to defray the excess cost of transportation is not otherwise provided through Federal, State, or local funding, where necessary to enable students to remain in their school of origin [ESSA § 723(d)(5)].
6. The provision of developmentally appropriate early childhood education programs, not otherwise provided through Federal, State, or local funding, for preschool-aged homeless children [ESSA § 723(d)(6)].
7. The provision of services and assistance to attract, engage and retain homeless children and youth, particularly homeless children and youth who are not enrolled in school, in public school programs and services provided to non-homeless children and youth [ESSA § 723(d)(7)].
8. The provision for homeless children and youth of before- and after-school, mentoring, and summer programs in which a teacher or other qualified individual provides tutoring, homework assistance, and supervision of educational activities [ESSA § 723(d)(8)].
9. If necessary, the payment of fees and other costs associated with tracking, obtaining, and transferring records necessary to enroll homeless children and youths in school, including birth certificates,

immunization or other required health records, academic records, guardianship records, and evaluations for special programs or services [ESSA § 723(d)(9)].

10. The provision of education and training to the parents and guardians of homeless children and youths about the rights of, and resources available to, such children and youth, and other activities designed to increase the meaningful involvement of parents and guardians of homeless children or youth in the education of such children or youth.
11. The development of coordination between schools and agencies providing services to homeless children and youth in order to expand and enhance such services. Coordination with programs funded under the Runaway and Homeless Youth Act must be included in this effort [ESSA § 722(g)(5)(A)(i)].
12. The provision of specialized instructional support services (including violence prevention counseling) and referrals for such services [ESSA § 723(d)(12)].
13. Activities to address the particular needs of homeless children and youth that may arise from domestic violence and parental mental health or substance abuse problems [ESSA § 723(d)(13)].
14. The adaptation of space and purchase of supplies for any non-school facilities serving eligible students and adapting these facilities to enable them to provide services [ESSA § 723(d)(14)].
15. The provision of school supplies, including those supplies to be distributed at shelters or temporary housing facilities, or other appropriate locations [ESSA § 723(d)(15)].
16. The provision of other extraordinary or emergency assistance is needed to enable homeless children and youths to attend school and participate fully in school activities [ESSA § 723(d)(16)].

McKinney-Vento Subgrant

The McKinney-Vento subgrant is awarded to LEAs through a competitive grant [ESSA § 723(c)(1)]. SEAs must consider the needs of homeless children and youth and the ability of the LEA to meet students' needs in determining subgrant awards [ESSA § 723(c)(2)]. Also, the SEA must consider the quality of the grant application in order to deem the LEA eligible to receive the McKinney-Vento subgrant. An LEA that seeks a McKinney-Vento award must submit to its SEA an application that contains the following information:

- An assessment of the educational and related needs of homeless children and youth in the area served by the LEA;
- A description of the services and programs that the LEA will provide to address these needs;
- An assurance that the LEA meets the fiscal effort requirement;
- An assurance that the LEA will use subgrant funds in compliance with ESSA § 722(g)(3)–(7) of the McKinney-Vento Act;
- A description of policies and procedures that the LEA will implement to ensure that its activities would not isolate or stigmatize homeless children and youth;

- An assurance that the LEA will collect and promptly provide data requested by the State Coordinator pursuant ESSA § 722(f)(1)–(3); and
- An assurance that the LEA will meet the requirements of ESSA § 722(g)(3) regarding LEA requirements.

In Tennessee, the department awards the McKinney-Vento subgrant on a three-year grant cycle. The state coordinator will announce when the subgrant cycle is available and will provide technical assistance about the grant process prior to the opening of the cycle. Subgrant recipients must complete a Mid-Year Performance Report and Closeout Report annually, within the grant cycle, in order to renew the grant for the upcoming year. The next McKinney-Vento subgrant competition will occur in the summer of 2022. For more information, see the department's FY20 [McKinney-Vento Subgrant Guide](#).

Annual Reports

Data Supports Program Compliance

The McKinney-Vento Act requires SEAs to collect data and provide that data to the federal government [42 U.S.C. § 11432(f)(1)], [42 U.S.C. § 11432 (f)(3)]. Data is used to help make a determination for subgrant awards; ensure compliance with Title I, Part A requirements; and create required reports for Congress, the general public, department staff, and other government officials.

Data collection begins at the school and LEA levels. Each LEA has a local liaison for homeless education who is responsible for ensuring the identification of homeless students through coordinated activities with other school personnel and community agencies [42 U.S.C. § 11432(g)(6)(A)(i)]. The liaison is also responsible for working with the LEA's data staff and the State Coordinator to ensure the LEA provides accurate data that meets the required elements outlined by the Secretary of Education.

LEAs should ensure that they have strong and consistent procedures focused on student coding.

Training should be provided to any LEA or school level staff involved in the process to ensure eligible students are being coded correctly and in a timely manner. Liaisons must review data prior to submission to the SEA to ensure it accurately represents both homeless students and the LEA. For more information on the accurate coding of students experiencing homelessness, see the [Federal Programs and Oversight Data Manual](#), found in [ePlan.tn.gov > TDOE Resources](#) > Federal Programs and Oversight > FPO Data.

Homeless Immunization Report

In Tennessee, the commissioner of education is required by state law [T.C.A § 49-6-5001] to report annually the number of homeless children that are enrolled in public schools without immunization or proof of immunization and the average length of time required for the children to be immunized or to obtain immunization records. The state coordinator will communicate deadlines and provide guidance for the homeless immunization report to local liaisons each year.

Promising Practices

Helpful Practices for the Homeless Education Program

Mindset: Homelessness is not Permanent

There are many stigmas associated with being homeless, and many of these stigmas can leave students and families with feelings of guilt and shame. Consider the verbiage used when describing a person because it can be seen as demoralizing. Your choice of words can make a significant impact on families' receptiveness to a program. For example, Rutherford County Schools provides services for "families in transition" through its Academic Time Leads to Achieving Students (ATLAS) program. Having an impactful name makes it easier to present your services to families who are in need.

Meeting the Need

While items such as food, clothing, and school supplies are definitely a need for students, keep in mind that McKinney-Vento and Title I, Part A homeless set-aside funds can be used for much more! Students experiencing homelessness, in most cases, are dealing with very traumatic experiences. Funding can also be used to provide programs that address the needs that stem from domestic violence and parental mental health or substance abuse programs [ESSA § 723(d)(13)] and programs that are developmentally appropriate for preschool-aged youth [ESSA § 723(d)(5)].

Youth experiencing homelessness are also eligible to receive expedited evaluations to determine if there is a need for disability services under the Individuals with Disabilities Education Act (IDEA) [20 U.S.C. § 1400-1444] and [29 U.S.C § 794] (Section 504). It is key to ensure that homeless children and youth with disabilities receive the full range of services to meet their complex needs. The following are three key strategies to increase the collaboration between LEA homeless and special education programs:

1. Create and promote policies and practices for regular, ongoing communication and collaboration among the homeless program and special education staff.
2. Review and, if necessary, revise state and local policies and practices to remove barriers and ensure the necessary tools are available to address complex situations creatively, flexibly, and expeditiously.
3. When a complex situation related to a specific student arises, work as a team, utilizing a clear and consistent process to resolve the situation.

Look for New Ways

The needs of students often change from year to year. Evaluate your program regularly and involve staff, students, families, and community members in that evaluation. Look at multiple data sources to determine if your program is meeting its goals and objectives. In addition to academic data, it is also important to examine data points around attendance, student participation in extracurricular activities, and social-

emotional well-being as well. Also, use the results from other program-related assessments such as the department's Results-Based Monitoring process to help strengthen areas of your program.

Engage

Parent and family engagement activities can provide families the opportunity to build and strengthen relationships with the school and, most importantly, within their own family. Title I, Part A homeless district set-aside, and McKinney-Vento subgrant funds can be used to fund such activities.

Sample Engagement Steps:

- Teachers or family-school liaisons can contact new families immediately in-person or by phone and give them all the information they need. By interviewing families, educators can more fully understand and appreciate families' circumstances and explain the options that are available for their child.
- Discuss the impact of school transfers with families, as well as what the school and family can do to help the student through the transition.
- Have information packets ready for families who enter after the beginning of the school year.
- Provide more detailed information in the school records of highly mobile students to allow future teachers to better determine academic and course enrollment options.
- Have a system for forwarding complete records to new schools or LEAs quickly.
- Provide packets to help families organize their student's academic records.
- Provide school brochures to local shelters to encourage children's attendance by providing parents with information about enrollment procedures and transportation.
- Provide opportunities for homeless parents to meet with teachers and support staff to share information about their child and to receive information about their child's progress in school.
- Discuss barriers faced by the family and help link the family to service providers.
- At homeless shelters, provide teams consisting of staff and, perhaps, parents of homeless students to answer questions, help fill out forms, provide general support to parents and check on students who are absent frequently.
- Provide tutoring, homework help, or credit recovery after school at the school building or community locations (e.g. homeless shelters, churches) to help students with their academic progress. Provide snacks or full meals.
- Ensure that at least one adult in the school (a teacher, administrator, or support staff member committed to serving as a supportive, caring adult in the child's life while he or she is attending the school.

For more information and guidance around parent and family resources, visit <https://nche.ed.gov/parent-resources/>.

Support Services

Often, students who are experiencing homelessness may have needs that initially appear to be beyond our control. Having a resource manual that exhibits what supports are available in the community and school can educate families on how their needs can be met. Sample referral templates can be found [here](#). To utilize these templates:

1. Add local contact information.

- Read through the form instructions.
- Follow the hyperlinks provided and search for local agencies.
- Type local contact and agency information into the forms or a draft document.

2. Vet your sources.

- Call any contacts/agencies you don't already know to confirm the services provided.
- Whenever possible, visit in person, so you can let families know what to expect. **Don't refer families to agencies you haven't vetted!**
- Touch base with colleagues who may have additional information.

3. Spread the word.

- Make photocopies of the referral lists to be distributed to families and youth.
- Create a binder with the referral lists and additional paper to be kept in a central school location, like the front office. Let school staff know where to find the information and to leave notes for one another about helpful connections and referrals.
- Update the referral lists on an ongoing basis.

Resources for Local Liaisons

Department Resources

- [ePlan > TDOE Resources](#) > ESSA Information, Guidance, PPTs, & Webinars > Title IX, Part A Education for Homeless Children & Youth
- Tennessee Head Start: <https://www.benefits.gov/benefit/1940>
- Supplemental Nutrition Assistance Program (SNAP): <https://www.tn.gov/humanservices/families/supplemental-nutrition-assistance-program-snap.html>
- Kidcentral TN: <https://www.kidcentraltn.com/>
- Tennessee Vaccines for Children (VFC) Program: <https://www.tn.gov/health/cedep/immunization-program/ip/vfc.html>

Federal Resources

- National Association for the Education of Homeless Children and Youth <https://naehcy.org/>
- National Center for Homeless Education: <http://center.serve.org/nche/>
- Homeless Liaison Toolkit 2017: <https://nche.ed.gov/homeless-liaison-toolkit/>
- U.S. Department of Education Non-Regulatory Guidance: <https://www2.ed.gov/policy/elsec/leg/essa/160240ehcyguidance072716.pdf>
- U.S. Department of Education Homeless Student Fact Sheet: <https://www2.ed.gov/policy/elsec/leg/essa/160315ehcyfactsheet072716.pdf>
- The U.S. Department of Housing (HUD): <https://www.hud.gov/>
- Higher Education For Students Experiencing Homelessness: [NCHE Higher Education](#)
- Federal Student Aid: [FAFSA](#)
- Federal Student Aid Application and Verification Guide: [FAFSA Guide](#)

Non-Profit Resources

- Schoolhouse Connection: <https://www.schoolhouseconnection.org/>

References

Education for Homeless Children and Youths, 42 U.S.C. § 119, Subchapter VI, Part B.

[https://uscode.house.gov/view.xhtml?path=/prelim@title42/chapter119/subchapter6/partB&edition=prelim#:~:text=\(1\)%20Each%20State%20educational%20agency,to%20other%20children%20and%20youths.](https://uscode.house.gov/view.xhtml?path=/prelim@title42/chapter119/subchapter6/partB&edition=prelim#:~:text=(1)%20Each%20State%20educational%20agency,to%20other%20children%20and%20youths.)

Law & Guidance Elementary & Secondary Education Part C -Homeless Education - [McKinney-Vento Law](#)

Perna, L., Rowan-Kenyon, H., Thomas, S., Bell, A., Anderson, R., & Chunyan, L. (2008). The role of college counseling in shaping college opportunity: Variations across high schools. *The Review of Higher Education*, 31(2), 131-159. <https://doi.org/10.1353/rhe.2007.0073>

Statement of Policy, 42 U.S.C § 11431.

<https://www.law.cornell.edu/uscode/text/42/11431#:~:text=Statement%20of%20policy,-U.S.%20Code&text=Each%20State%20educational%20agency%20shall,to%20other%20children%20and%20youths>

Strawser, S., Markos, P.A., Yamaguchi, B.J., & Higgins, K. (2000). A new challenge for school counselors: children who are homeless. *Professional School Counseling*, 3(3), 162-172.

U.S. Department of Education. Education for Homeless Children and Youths Program Non-Regulatory Guidance. (July 27, 2016). (H-1) [Web](#).

Weiss, H., & Jacobson, L. (2017, August 1). Youth Taking Leading Roles: Defining and Improving Family Engagement [Web log post]. Retrieved February 13, 2018, <https://globalfrp.org/Articles/Youth-Taking-Leading-Roles-Defining-and-Improving-Family-Engagement>

Appendix A: Sample Templates

[Sample End-of-Year Reverification Letter](#)

[McKinney-Vento Housing Questionnaire Template](#)

[McKinney-Vento Housing Form Template](#)

[McKinney-Vento Housing and Education Rights Form Template](#)

[Tips for Challenging Conversations about Housing](#)

[Best Interest School Selection Checklist](#)

[McKinney-Vento Transportation Options Sample](#)

[McKinney-Vento Transportation Memorandum of Understanding \(MOU\) Template](#)

[McKinney-Vento FAFSA Round-Up Week Tips for School Counselors](#)

[McKinney-Vento FAFSA Round-Up Week Sample Email to Students](#)

[McKinney-Vento Caregiver Authorization Form](#)

[Independent Student Status of Unaccompanied Homeless Youth Determination for the FAFSA](#)

[Tips for Sharing and Respecting Privacy of Homeless Children and Youth](#)

[ePlan Sample Referral Templates](#)